

Exhibit A

Declaration of Dawn Baum

HOGAN LOVELLS US LLP
Erin N. Brady (CA 215038)
erin.brady@hoganlovells.com
1999 Avenue of the Stars, Suite 1400
Los Angeles, California 90067
Telephone: (310) 785-4600
Facsimile: (310) 785-4601

Counsel for the Yurok Tribe

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

In re:

PG&E CORPORATION,

- and -

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric
Company
☒ Affects both Debtors

** All papers shall be filed in the Lead Case,
No. 19-30088 (DM)*

Bankruptcy Case No. 19-30088 (DM)

Chapter 11

(Lead Case) (Jointly Administered)

**DECLARATION OF DAWN BAUM IN
SUPPORT OF THE MOTION OF THE
YUROK TRIBE FOR
RECONSIDERATION OF THE ORDER
DISALLOWING AND EXPUNGING
PROOFS OF CLAIM PURSUANT TO
REORGANIZED DEBTORS' FIFTY-
THIRD OMNIBUS OBJECTION TO
CLAIMS (NO LIABILITY
SUBCONTRACTOR CLAIMS)**

[Re: Docket No. 10104; Claim No. 55953]

I, Dawn Baum, declare as follows:

1. I am the Deputy General Counsel of the Yurok Tribe. I have served in this position since June 2017. I also served as the acting Executive Director of the Yurok Tribe from November 2019 through January 2020. The Yurok Tribe is a federally-recognized Indian tribe located in a remote area of northwestern California in the region of the Trinity and Klamath river basins.

2. I submit this declaration (the "Declaration") on behalf of the Yurok Tribe in support of the *Motion of the Yurok Tribe for Reconsideration of the Order Disallowing and Expunging*

1 *Proofs of Claim Pursuant to Reorganized Debtors' Fifty-Third Omnibus Objection to Claims (No*
2 *Liability Subcontractor Claims)* (the "Motion"). Capitalized terms used but not defined herein shall
3 have the meanings assigned to such terms in the Motion.

4 3. I have personal knowledge of the facts stated in this Declaration. If called as a
5 witness I could, and would, competently testify under oath as set forth below.

6 4. I was involved in the evaluation and preparation of the Yurok Claim, which was
7 filed in the PG&E bankruptcy case on October 18, 2019. Since the filing of the Yurok Claim, I
8 have reviewed notices in the PG&E bankruptcy that the Yurok Tribe periodically receives in the
9 mail, and have contacted outside counsel, as needed, to discuss the content of such notices. All of
10 the notices addressed to the Yurok Tribe in connection with the PG&E bankruptcy are sent to the
11 Yurok Reservation by postal mail. I do not receive any notices or copies of pleadings or orders in
12 the PG&E bankruptcy by electronic mail or other electronic means. In addition, aside from the
13 notices that are mailed to the Yurok Reservation, I have not received any form of direct outreach
14 or follow-up correspondence from PG&E or the Debtors regarding the Yurok Claim.

15 5. I was diagnosed with breast cancer in July 2020. I underwent five months of
16 chemotherapy through mid-December 2020, working remotely and on reduced hours during that
17 time. I had surgery on January 13, 2021, and was not working from then until January 25, 2021.

18 6. Due to the ongoing COVID-19 pandemic, and particularly in light of the surge of
19 coronavirus cases in California, during the months of December 2020 and January 2021, the Yurok
20 Tribe's legal staff was working entirely remotely, which continues to this day. The impact of the
21 COVID-19 pandemic, including state-wide restrictions and lockdown orders, on the Yurok Tribe
22 has caused additional extenuating circumstances with respect to the receipt of mail that is addressed
23 to the Yurok Reservation, particularly in the recent months while I was out on medical leave.

24 7. Upon my returning to work post-surgery, I went into the Yurok Tribe's legal office
25 on February 12, 2021 to retrieve mail and other documents. It was on February 12, 2021 that I saw
26 and opened the notices relating to the Objection. I immediately contacted outside counsel regarding
27 the Reorganized Debtors' Objection to the Yurok Claim. It was only at this time that I discovered
28 the response deadline had already passed and that the default Order had been entered.

1 I declare under penalty of perjury under the law of the United States and the state of
2 California that the foregoing is true and correct.

3 Executed this 19th day of February, 2021 at Klamath, California.

4
5 /s/ Dawn Baum

6 Dawn Baum
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28